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20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 NAVAJO HEALTH FOUNDATION – SAGE
 23 MEMORIAL HOSPITAL, INC. (doing business
 24 as “Sage Memorial Hospital”); an Arizona non-
 25 profit corporation

26 Plaintiff,

27 v.

28 RAZAGHI DEVELOPMENT COMPANY,
 29 LLC; a Nevada limited liability company (doing
 30 business as “Razaghi Healthcare”), et al.,

31 Defendants.

32 Case No. 2:19-cv-00329-GMN-EJY

33 **JOINT STIPULATION TO
 34 EXTEND TIME FOR
 35 DEFENDANTS TO FILE REPLY
 36 IN SUPPORT OF DEFENDANTS’
 37 MOTION TO DISMISS SECOND
 38 AMENDED COMPLAINT**

39 **(SECOND REQUEST)**

40 IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi
 41 Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively,
 42 “Defendants”) shall have an extension of time, up to and including February 4, 2022, to
 43 submit Defendants’ reply in support of their Motion to Dismiss Second Amended Complaint

1 (ECF No. 147) therein addressing the arguments raised in Plaintiff's Opposition to
 2 Defendants' Second Motion to Dismiss (ECF No. 164).

3 The parties have so stipulated to this extension request due to defense counsel's
 4 concurrent case obligations as well as recent illness in defense counsel's family and office.
 5 Unfortunately, the defense counsel primarily responsible for preparing the reply brief in this
 6 matter has recently been ill and had illness in her immediate family that has necessitated her
 7 attention away from preparing the instant briefing. Further, defense counsel's office has
 8 unfortunately experienced several illnesses within the office, including illness of a partner
 9 and legal assistant, which has required the remaining attorneys and staff to cover existing
 10 and time-sensitive obligations. The additional time requested herein will permit counsel for
 11 Defendants to meet other case commitments while addressing the arguments raised in
 12 Plaintiff's Opposition to Defendants' Second Motion to Dismiss (ECF No. 164). The parties
 13 agree that good cause exists to support this request for Defendants to have additional time,
 14 up to and including February 4, 2022, to submit their reply in support of their Motion to
 15 Dismiss Second Amended Complaint. This is the second request to extend this deadline.

16 RESPECTFULLY SUBMITTED this 19th day of January 2022.

17 JENNER & BLOCK LLP

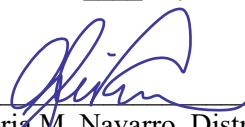
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23 **IT IS SO ORDERED. IT IS FURTHER**
 24 **ORDERED** that no further continuances
 will be granted without a hearing to
 demonstrate a sufficient basis for further
 25 extension of deadlines.

26 Dated this 19 day of January, 2022

27 
 28 Gloria M. Navarro, District Judge
 UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

2 This is to certify that on January 19, 2022, the undersigned, an employee of Fisher
3 & Phillips LLP, electronically filed the Joint Stipulation to Extend Time for Defendants to
4 File Reply in Support of Defendants' Motion to Dismiss Second Amended Complaint with
5 the U.S. District Court, and a copy was electronically transmitted from the Court to the e-
6 mail address on file for:

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